

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 09-40024-FDS
)	
JAMES FORD)	

MOTION TO CONTINUE PLEA HEARING

The defendant in this matter respectfully requests, through counsel, that the Rule 11 hearing currently scheduled for April 9, 2010 be continued to any of the following dates in the afternoon if possible: May 4, 6, 12, 13 of 2010. As reason therefore, defense counsel states that Magistrate Judge Hillman has ordered that this case stay within his session through at least April 9, 2010 for the purpose of resolving a discovery issue raised by the defendant.

Defense counsel has notified Assistant United States Attorney David Hennessy of this request. The defendant agrees to the exclusion of time for speedy trial purposes from April 9, 2010 through the next date set by this Court for a plea hearing.

JAMES FORD
By his attorney,

/s/ Oscar Cruz, Jr.
Oscar Cruz, Jr.
B.B.O. #630813
Federal Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Oscar Cruz, Jr., hereby certify that this document filed through the ECF system will be sent electronically to the registered participant, David Hennessy, as identified on the Notice of Electronic Filing (NEF) on March 29, 2010.

/s/ Oscar Cruz, Jr.
Oscar Cruz, Jr.